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August 31, 2018

Ms. Laura Pennebaker
Associate Deputy Director, Transportation Planning
California Transportation Commission
1120 N Street, Room 2233 (MS-52)
Sacramento, CA 95814

RE: **Draft 2018 Comprehensive Multimodal Corridor Plan Guidelines**

Dear Ms. Pennebaker:

The Orange County Transportation Authority (OCTA) appreciates the opportunity to offer comments for the draft 2018 Comprehensive Multimodal Corridor Plan (CMCP) Guidelines. OCTA supports a balanced approach to the CMCP Guidelines which includes maximizing flexibility for the future 2020 Solutions for Congested Corridors Program (SCCP) and offers the following comments to enhance competition and coordination.

California Department of Transportation (Caltrans) Corridor Planning Guidebook

- The draft CMCP references the Caltrans Corridor Planning Guidebook, which is incorporated by reference. To date, the guidebook is not available for review or comment, and thus OCTA cannot evaluate the draft CMCP.

Timing and Approvals

- The California Transportation Commission (CTC) expects to adopt the draft CMCP at the December 2018 meeting, with the expected release of the 2020 SCCP call for projects (call) in spring 2020. The CTC will determine compliance of the multimodal corridor plans concurrently with the approvals of the SCCP applications. This sequencing may not allow adequate time to complete a new or updated plan. Single mode corridor plans may take up to two years to complete and additional modes bring more complexity. Given the time constraints, OCTA requests flexibility in determining compliance of the multimodal corridor plans. This may include incorporating the guidance established in the 2018 SCCP, allowing flexibility to deliver a hybrid plan, and allowing analysis, modelling, and outreach efforts completed through existing plans and studies.

Ms. Laura Pennebaker
August 31, 2018
Page 2

Outreach Requirements

- The draft CMCP should allow agencies flexibility to fulfill outreach activities as specific corridors may vary from region to region. In addition, projects included in hybrid plans may have already had extensive outreach efforts completed.

Multi-Agency Program Delivery

- The draft CMCP indicates that agencies responsible for preparing the plan must have the authority to eventually implement the improvements in the plan. The implementation of some of these improvements are the responsibility of local agencies and not necessarily the county transportation commissions or regional transportation planning agencies.

Technical Clarifications Needed

- The CMCP Guidelines require that the plan should apply performance metrics for each project and strategy. OCTA recommends CTC allow flexibility in performance metrics.

OCTA encourages the CTC allow maximum flexibility in the CMCP. This will give agencies the ability to deliver a comprehensive multimodal corridor plan efficiently, leverage prior efforts, and represent the needs of the community.

Thank you for allowing the opportunity to provide comments. Please feel free to contact Louis Zhao, Section Manager, Discretionary Funding Programs, at (714) 560-5494 if you have any questions.

Sincerely,



Kurt Brotcke
Director, Strategic Planning

KB:lz

c: Adriann Cardoso, OCTA
Louis Zhao, OCTA